THE LAW FIRM OF

CONNORS & CONNORS

766 Castleton Avenue Staten Island, New York 10310-9003 Tel: 718-442-1700 Fax: 718-442-1717

JOHN P. CONNORS (1955-2003)

TIMOTHY M. O'DONOVAN**

JOHN P. CONNORS, Jr.*

Louis J. Rasso Zena Woldeyesus

HAROLD J. SIEGEL

Susan E. O'Shaughnessy** Robert J. Pfuhler**

OF COUNSEL
MICHAEL IRENE***

Michael J. Caulfield**
David S. Heller

JOEL ZUCKERBERG ANDREW AXLER August 22, 2008

17 Battery Place New York, New York 10004

Page 1 of 1

Morris Brook Commons 422 Morris Avenue Long Branch, New Jersey 07740

* MEMBER N.Y., N.J. & D.C. BARS

** MEMBER N.Y., N.J. BARS

*** MEMBER N.J. BAR

Via ECF

Hon. Robert W. Sweet United States District Court Southern District of New York 500 Pearl Street New York, New York 10007-1312

Re:

Sanchez v. Target Corporation

Docket No.: 08 CV 3173 Our File No.: DTS 23741

Your Honor:

Our office represents defendant Target Corporation in the above-referenced matter.

During the conference before your Honor on May 28, 2008, the Court gave the parties 90 days to complete discovery. The parties were also ordered to submit a pre-trial order by September 10, 2008.

At this time, the depositions, plaintiff's independent medical examination and the plaintiff's response to defendant's July 16, 2008 Notice to Produce are outstanding. As such, we request an additional 60 days to complete discovery.

We have spoken with plaintiff's counsel and he has consented to this request. This is the first request for an extension of time.

Thank you for your attention to this matter.

Very truly yours,

CONNORS & CONNORS, P.C.

By:

ROBERT J. PFUHLER rjpfuhler@connors.com

RJP/is